

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, Individually and On	:	Civil Action No. 1:07-cv-07895-DAB
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
CHINA SUNERGY CO. LTD., et al.,	:	
	:	
Defendants.	:	
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ADEL SHESHTAWY, Individually and On	:	Civil Action No. 1:07-cv-08656-DAB
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
CHINA SUNERGY CO. LTD., et al.,	:	
	:	
Defendants.	:	
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ANTHONY GIOMBETTI, et al., Individually	:	Civil Action No. 1:07-cv-09689-UA
and On Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiffs,	:	
	:	
vs.	:	
	:	
CHINA SUNERGY CO. LTD.,	:	
	:	
Defendant.	:	
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NOTICE OF WITHDRAWAL OF MOTION FOR CONSOLIDATION, APPOINTMENT AS  
LEAD PLAINTIFF AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Proposed Lead Plaintiffs Howard Hughes, Don Vandenhueval, Jie Wu and Andrew P. Van Gorder (the “Hughes Group”) hereby withdraw their Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel. This Withdrawal shall have no effect upon the Hughes Group’s rights as members of the proposed class, including but not limited to the right to share in any recovery from the resolution of these actions through settlement, judgment, or otherwise.

DATED: November 30, 2007

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP

*/s/ Mario Alba Jr.*  
\_\_\_\_\_  
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[Proposed] Lead Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I, Mario Alba Jr., hereby certify that on November 30, 2007, I caused a true and correct copy of the attached:

Notice Of Withdrawal Of Motion For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

CHINA SUNERGY

Service List - 11/28/2007 (07-0229)

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CHINA SUNERGY

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